

Michelle Strobel

July 14, 2006

Federal Trade Commission  
Office of the Secretary, Room H-135 (Annex W)  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Madam or Sir,

SUBJECT: Business Opportunity Rule, R511993

I am writing in opposition of the proposed Business Opportunity Rule. This ruling directly undermines the dedication, honesty and hard work of all the individuals who have spent years developing careers for themselves and others. It does this by asserting through its language and content that direct sales in general is not an honest and reputable career.

The opportunity I took with lia sophia has changed my life in unbelievable ways. From having the freedom and flexibility to work around the needs of my family and the chance to generate an income that will far surpass the income I am making in my current "corporate" job.

I believe erasing the \$500 threshold exemption for opportunities is detrimental to each company out there offering a low-risk or no-risk start up fee. For example, our start-up cost is only \$99, and lia sophia has always put honesty and integrity first. We present an opportunity with no false promises or misguided statements. Our \$99 start-up fee is hardly one that bankrupts families like other bogus companies out there selling distributorships for thousands of dollars. Your proposed rule puts our opportunity in the same category as buying a franchise/distributorship from a business.

The direct sales industry represents a huge portion of the workforce today and has gained respect and acknowledgement in the business world and from consumers' point-of-view through hard work, dedication to our business and honest and integrity in our ethics. Your proposed ruling asserts that direct sales as a general industry is unethical and underhanded by imposing waiting periods for sign-ups and disclosure of private and personal information to the public.

Furthermore, the proposed ruling asks each of us to send our potential team members to our competitors. Would a franchise/distributorship ask their customers to check with another franchise/distributorship before purchasing something? I think not; yet the FTC, through this proposal, is asking each of us to send our potential business opportunity customers to our competition.

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I respect the need to protect consumers from fraudulent business practices. However, requiring this protection to be at the expense of my business is unacceptable. Not only will this ruling be detrimental to each of the honest and reputable companies and its advisors/consultants but also it comes at expense to our customers through increased paperwork and forms required to even inquire into the opportunity. Who is going to pay for these forms and disclosures? Our customer - through increased prices due to increased expense of doing business.

Perhaps assigning an 800 number to the FTC for individuals to call and get a "rating" of the company they are joining based on history of valid complaints and court decisions would be practical. It is certainly an alternative to requiring additional forms, disclosures and waiting periods.

While I believe safeguarding the consumer is necessary, so is the requirement that each consumer be held responsible to meet the FTC halfway when deciding to take an advantage of an opportunity.

I sincerely request that you read each and every letter you receive regarding this matter not only from business owners like me but from the DSA and DSWA and the companies just like lia sophia who they represent.

Sincerely,

Michelle Strobel  
lia sophia Advisor and Career Developer